

THE ENGEL LAW GROUP, PLLC

280 Madison Avenue – Suite 705

New York, NY 10016

Telephone: (212) 665-8095

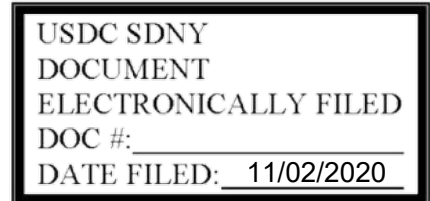
Email: aee@elgpllc.com

Facsimile: (888) 364-3564

October 30, 2020

BY ECF

Hon. Judge John P. Cronan
United States District Court
Southern District of New York
500 Pearl Street – Room 1320
New York, NY 10007



Re: *GateGuard, Inc. v. MVI Systems LLC* (19-cv-2472)
Request re: the Court's Reassignment Order (Dkt. #116)

Dear Judge Cronan,

I represent the two original Defendants in the above-referenced action, MVI Systems and Samuel Taub, and am joined in this letter by counsel for the other Defendant, MVI Industries.

On behalf of the Defendants, I hereby request a one-week extension, to November 6, of the parties' mutual obligation to file the joint letter described in the Court Reassignment Order (Dkt. #116). While we have not received a draft or proposal from the Plaintiff regarding the joint letter, counsel for the parties will be engaging in a meet and confer process early next week regarding discovery and other scheduling matters, and the Defendants believe the Plaintiff will consent to the requested extension.

The bases for our request are: (1) the parties have a joint discovery report due to Judge Freeman that we would like to coordinate with the joint letter to Your Honor (2) the Defendants are filing a motion early next week that relates to the Defendants' recently filed motions to compel arbitration and/or dismiss on substantive grounds, and we believe it will be helpful to the Court if that motion is included and described in the parties' joint letter and (3) the joint letter will otherwise benefit from the parties engaging in their scheduled meet and confer session(s) early next week and having the results thereof reflected in their joint letter.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Adam Engel".

Adam E. Engel

*Counsel for Defendants
MVI Systems and Samuel Taub*

Cc: All Counsel of Record by ECF

Defendants' request is GRANTED. The joint status letter that was due October 29, 2020 is now due November 6, 2020. The Court again directs counsel to 3.B of the Court's Individual Rules and respectfully reminds counsel to make timely requests for extensions in the future.

SO ORDERED.

Date: October 31, 2020

New York, New York

A handwritten signature in black ink, appearing to read "John P. Cronan".

JOHN P. CRONAN

United States District Judge